

1 Shaun Setareh (SBN 204514)
shaun@setarehlaw.com
2 Thomas Segal (SBN 222791)
thomas@setarehlaw.com
3 Farrah Grant (SBN 293898)
farrah@setarehlaw.com
4 SETAREH LAW GROUP
315 S. Beverly Drive, Suite 315
5 Beverly Hills, California 90212
Telephone (310) 888-7771
6 Facsimile (310) 888-0109

7 Attorneys for Plaintiff
DEAN R. ROBBINS

8
9 Michael S. Chamberlin, SBN 124646
mchamberlin@bakerlaw.com
Vartan S. Madoyan, SBN 279015
10 vmadoyan@bakerlaw.com
Nicholas D. Poper, SBN 293900
11 npoper@bakerlaw.com
BAKER & HOSTETLER LLP
12 11601 Wilshire Boulevard, Suite 1400
Los Angeles, CA 90025-0509
13 Telephone: (310) 820-8800
Facsimile: (310) 820-8859
14

15 Attorneys for Defendant
PHILLIPS 66 COMPANY

16 UNITED STATES DISTRICT COURT
17
18 NORTHERN DISTRICT OF CALIFORNIA

19
20 DEAN A. ROBBINS and TIMOTHY
GREEN, on behalf of themselves, all others
similarly situated,

21
22 *Plaintiffs,*

23 vs.

24 PHILLIPS 66 COMPANY, a Delaware
corporation; and Does 1 through 50, inclusive,

25
26 *Defendants.*

Case No. 3:18-cv-00292-RS
(Consolidated Case No. 19-cv-01558-RS)

Assigned For All Purposes To The Honorable
Richard Seeborg, Courtroom 3

**JOINT SCHEDULING STIPULATION
AND [PROPOSED] ORDER**

Action Filed: November 27, 2017
Action Removed: January 12, 2018

1 This Stipulation is made by and between Plaintiff DEAN ROBBINS (“Plaintiff”) and
2 Defendant PHILLIPS 66 COMPANY (“Defendant”) (“collectively, the “Parties”), through their
3 respective counsel of record, seeking a modified class certification briefing schedule.

4 WHEREAS, on November 27, 2017, Plaintiff filed this lawsuit in the San Francisco
5 Superior Court alleging that Defendant had violated the California Labor Code;

6 WHEREAS, on January 12, 2018, Defendant removed the action to this Court;

7 WHEREAS on September 6, 2019 the Court entered a modified scheduling order with the
8 following dates:

9 May 5, 2020, Deadline for Plaintiffs to file Motion for Class Certification.

10 June 29, 2020 Deadline for Defendant to file Opposition to Class Certification.

11 July 20, 2020 Deadline for Plaintiffs to file Reply Brief.

12 August 20, 2020, Hearing on Motion for Class Certification.

13 In light of the ongoing shutdowns due to COVID 19, the parties have not taken the
14 depositions of named plaintiffs Dean Robbins and Timothy Green or the Rule 30(b)(6) deposition
15 of Phillips 66, and have been unable to conduct other litigation activities to prepare for class
16 certification briefing. Accordingly, the parties stipulate and request that the Court enter a modified
17 schedule as follows:

- 18 • September 15, 2020, Deadline for Plaintiffs to file Motion for Class Certification.
- 19 • November 16, 2020, Deadline for Defendant to file Opposition to Class
20 Certification.
- 21 • December 4, 2020, Deadline for Plaintiffs to file Reply Brief.
- 22 • January 21, 2021, at 1:30 p.m., Hearing on Motion for Class Certification.

23 IT IS SO STIPULATED.
24

25 DATED: May 1, 2020

SETAREH LAW GROUP

26 /s/ Shaun Setareh
27 SHAUN SETAREH
28 THOMAS SEGAL
FARRAH GRANT

Attorneys for Plaintiff
DEAN A. ROBBINS

DATED: May 1, 2020

BAKER & HOSTETLER LLP

/s/ Vartan S. Madoyan

MICHAEL S. CHAMBERLIN
VARTAN S. MADOYAN
NICHOLAS D. POPER
Attorneys for Defendant
PHILLIPS 66 COMPANY

Pursuant to L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

/s/ Shaun Setareh

[PROPOSED] ORDER

Pursuant to the Parties' stipulation, the Court grants the stipulation to modify the briefing schedule for class certification, and sets the following dates:

- September 15, 2020, Deadline for Plaintiffs to file Motion for Class Certification.
- November 16, 2020, Deadline for Defendant to file Opposition to Class Certification.
- December 4, 2020, Deadline for Plaintiffs to file Reply Brief.
- January 21, 2021, at 1:30 p.m., Hearing on Motion for Class Certification.

DATED: _____

HONORABLE RICHARD SEEBORG

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2020, a true and correct copy of the foregoing document was filed via the court's CM/ECF filing system and a copy was delivered via the same on all attorneys of record.

/s/ Shaun Setareh